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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 SHELLEY FREEMAN,

16 Plaintiff,

17 v.

18 WELLS FARGO & COMPANY, WELLS
19 FARGO BANK, N.A.,

20 Defendants.
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Case No. 4:23-cv-00476-DMR

**STIPULATION AND ORDER (AS
MODIFIED) TO CONTINUE FURTHER
CASE MANAGEMENT CONFERENCE**

The Hon. Donna M. Ryu

1 WHEREAS, on March 14, 2024, the Court set a further case management conference for
2 July 17, 2024 at 1:30 p.m. via videoconference and ordered that the Parties file an updated joint case
3 management statement by July 10, 2024 (ECF No. 49);

4 WHEREAS, the Parties are currently engaged in fact discovery;

5 WHEREAS, Plaintiff served Plaintiff's First Request for Production to Defendants (the
6 "Requests") on May 14, 2024;

7 WHEREAS, Defendants sought and Plaintiff agreed to extend the deadline to respond to the
8 Requests, which included 198 separate requests for production, to July 15, 2024;

9 WHEREAS, the Parties anticipate meeting and conferring on the scope and timing of
10 Defendants' production of documents, once Defendants serve their responses and objections to the
11 Requests;

12 WHEREAS, the Parties do not yet know if the assistance of the Court will be needed to resolve
13 Defendants' objections;

14 WHEREAS, the Parties are also currently negotiating a stipulated protective order and an
15 electronic discovery protocol that will govern the production of documents and electronically stored
16 information;

17 WHEREAS, the Parties have conferred and agreed that the interests of judicial efficiency and
18 economy would be best served by continuing the case management conference currently scheduled for
19 July 17, to enable the Parties to meet and confer on the scope and timing of Defendants' production of
20 documents and agree upon a stipulated protective order, to be submitted for the Court's approval, and an
21 electronic discovery protocol;

22 WHEREAS, the Parties do not have anything further to report to the Court at this stage, but have
23 agreed that, in the event circumstances necessitate an earlier further case management conference, they
24 will determine a mutually agreeable date for an earlier conference at the Court's availability;

25 WHEREAS, this stipulation is not a waiver of any Party's rights, remedies, claims or defenses;

26 IT IS ACCORDINGLY STIPULATED AND AGREED, by and between Plaintiff and
27 Defendants, by and through their authorized attorneys, and subject to approval by the Court, as follows:
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Respectfully submitted,

SULLIVAN & CROMWELL LLP

By: /s/ Diane L. McGimsey

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Counsel for Plaintiff Shelley Freeman

Attestation Pursuant to Local Rule 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

Dated: July 9, 2024

/s/ Diane L. McGimsey

Diane L. McGimsey

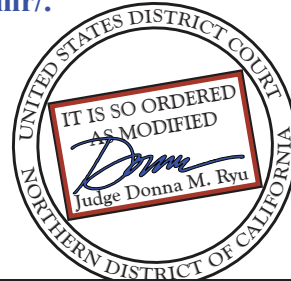
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ORDER (AS MODIFIED)

PURSUANT TO THE STIPULATION, IT IS ORDERED THAT the Further Case Management Conference set for July 17, 2024 at 1:30 p.m. is continued to October 16, 2024 at 1:30 p.m. in Oakland by Zoom Videoconference. Parties shall file an updated joint case management conference statement by October 9, 2024. All counsel and parties may access the webinar information (public hearings) at <https://cand.uscourts.gov/judges/ryu-donna-m-dmr/>.

IT IS SO ORDERED AS MODIFIED.

Date: July 10, 2024



Hon. Donna M. Ryu
United States Chief Magistrate Judge